

tive TV sets to be built. The consumer electronics business is intensely competitive and cannot bear the cost of processing several different formats and multiple, non-compatible input interfaces.

3. What voluntary standards are there in addition to IS-15?
Are they effective? (Par. 134(3))

The European Economic Community has a SCART connector similar in function to the EIA Multiport (but without the plug-in decoder feature) to handle satellite transmissions using the MAC (multiplexed analog component) system. Both the PAL terrestrial system and the MAC satellite system employ the same picture scanning standard, i.e., 625/50.

The U.S. already has multiport TVs and VCRs. The products have inputs and outputs for (baseband) video, audio and Y/C video connectors (with separate luminance and chrominance, overcoming problems with the "composite" NTSC system). Some have incorporated the EIA Multiport standard (IS-15).^{*} The latter connector combines several of these inputs and outputs into a single connector. This connector also enables a decoder for premium cable channels to be plugged into a TV or VCR, overcoming subscriber taping and remote control problems. (The multiport standard is being revised to handle Y/C video and pay-per-view.)

^{*}It should be noted that the continued offering by TV and VCR manufacturers of the EIA Multiport is heavily dependent on acceptance of the "plug-in decoder" concept by cable operators and its availability from the manufacturers of cable scrambling equipment.

Use of EIA Multiport with ATV Receivers

EIA believes that the EIA Multiport is an existing (audio and video) baseband interface standard which could be revised to handle ATV when an ATV transmission standard is chosen. By employing the multiport concept and adopting one terrestrial broadcast standard, the public could benefit from being able to purchase a complete functional television receiver, from antenna terminal to picture display, and still be able to access alternate media.

Use of EIA Multiport with Present Receivers

Present U.S. television receivers with an EIA Multiport of Y/C video input would be capable of displaying ATV pictures to the best of the receiver's capability with a plug-in adapter when broadcast, cable, or DBS transmissions begin. These receivers are compatible with S-VHS or ED-Beta (i.e., separate luminance (Y) and chrominance (C) signals) and have the capability of displaying 400 to 500 lines of resolution. This will provide for, in most cases, the ability to view ATV transmissions with S-VHS quality or better pictures.

4. Is OAR an alternative to a voluntary standard? What are its costs and benefits? (Par. 134-3)

Open architecture receiver means different things to different people. As proposed by Schreiber (and discussed earlier in Section III C.7) open architecture reflects the absence of standard setting. However,

if open architecture is redefined to mean "interoperability" or "friendly multiport" then it may be a logical approach.*

EIA believes that unrestricted open architecture is neither a panacea nor a standard. It simply creates a host of internal communication problems by serving as an open immigration policy for different standards languages.

Standards are the foundation of industries involving many parties. TV systems will not thrive without standards.

5. Can the FCC adopt compatibility standards for non-spectrum using media such as VCRs? (Par. 134(4))

EIA believes the FCC lacks authority to adopt compatibility standards for non-spectrum using media. The FCC only has such authority as Congress grants it.

The FCC does have catch-all authority under 47 USC 154 (i) to act "not inconsistent with the Act, as may be necessary to the execution of its functions." It would be an illogical leap to extend this to jurisdiction over

*A large cable MSO has advocated providing a video input to an ATV TV or VCR. June 23, 1988 testimony of Joseph Collins, Chairman and CEO, American Television and Communications Corporation, before the House Energy and Commerce Subcommittee on Telecommunications and Finance (page 10). This can be considered open architecture and falls outside the Schreiber definition.

non-broadcast products. Further, such an extension of authority is not in the best interest of consumers or competition in the marketplace.


V. CONCLUSION

EIA supports the Commission in its quest to ensure development of the best practicable broadcast standard for ATV. EIA believes that ATV will succeed as a commercial product if the transmission standard adequately meets the needs of the customers: the users of transmission equipment, satellites, components and sets. Further, EIA believes that the potential for success will be closely tied to the ability to deliver perceptible benefits to consumers, at a price in line with the value received. The standards established for ATV must not lose sight of the needs of consumers while balancing the needs of industry stakeholders.

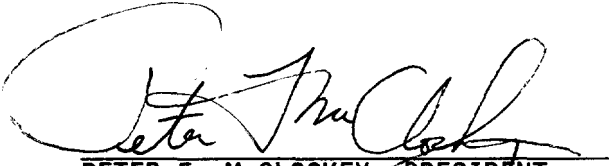
As it has with the black and white TV standard, the color standard and the stereo standard, EIA recognizes its obligation to assist the Commission and standard setting bodies to develop a technologically desirable and commercially feasible ATV standard.

Respectfully submitted,

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